1 2 3 4 5 6	Thomas P. Cartmell (pro hac vice)* Jonathan P. Kieffer (pro hac vice)* Austin Brane, SBN 286227 WAGSTAFF & CARTMELL LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 Tel: (816) 701-1100 Email: tcartmell@wcllp.com Email: jpkieffer@wcllp.com		
7 8	Email: abrane@wcllp.com Attorneys for Plaintiff (additional counsel on signature page)		
9			
11	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
12 13	DEKALB COUNTY SCHOOL DISTRICT,	CASE NO. 4:23-cv-5733	
14	Plaintiff,	MDL NO. 4:22-md-03047	
		NOTICE OF LEXECON OBJECTION	
15	V.	NOTICE OF LEAECON OBJECTION	
15 16 17 18 19	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC,	NOTICE OF LEAECON OBJECTION	
116 117 118 119 120 121 121 131	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC;	NOTICE OF LEAECON OBJECTION	
16 17 18 19 20 21 22	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC,	NOTICE OF LEAECON OBJECTION	
16 17 18 19 20 21 222 23	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC,	NOTICE OF LEAECON OBJECTION	
16 17 18 19 20 21 22 23 24	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC,	NOTICE OF LEAECON OBJECTION	
16 17 18 19	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC,	NOTICE OF LEAECON OBJECTION	
16 17 18 19 20 21 22 23 24 25	META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC,	NOTICE OF LEAECON OBJECTION	

1	NOTICE IS HEREBY GIVEN THAT, in accordance with Case Management Order No. 13		
2	(MDL 3047, ECF No. 780), plaintiff DeKalb County School District ("Plaintiff") hereby asserts its		
3	rights with respect to the jurisdiction of this Court for purposes of trial and objects to such jurisdiction		
4	pursuant to Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach, 523 U.S. 26 (1998). As stated		
5	in Plaintiff's complaint, the complaint is deemed to have been filed in the United States District Court		
6	for the Northern District of Georgia. See Case No. 4:23-cv-5733, ECF Nos. 1, 11; see also CMO 4,		
7	§ II.D (MDL 3047, ECF No. 119) ("At the completion of all pretrial proceedings this Court shall		
8	transfer such cases to the federal district court identified by the Plaintiff").		
9	9		
10	DATED: April 25, 2024 WAGSTAFF & CA	RTMELL LLP	
11			
12	12 /s/ Austin Brane		
13	Thomas P. Cartmell (Jonathan P. Kieffer (
14	Austin P. Brane, State Wagstaff & Cartmel	e Bar No. 286227	
15		Suite 300	
16	Tel. (816) 701-1100; tcartmell@wcllp.com	Fax (816) 531-2372	
17	11 20 5 11		
18	Joseph G. VanZandt (nro hac vice)*	
19	Davis Vaughn (pro ha Jennifer Emmel (pro	ic vice)*	
20	Clinton Richardson (probability of Seth Harding (probability of Seth Hardi	oro hac vice)*	
21	BEASLEY ALLEN CROW METHVIN PORTIS OF MILES, LLC		
22	11	Montgomery, AL 36103	
23	Email: Joseph.VanZandt@BeasleyAllen.com Email: Davis.Vaughn@BeasleyAllen.com		
24	24 Email: Jennifer.Emm	el@BeasleyAllen.com edson@BeasleyAllen.com	
25			
26	Kirk J. Goza (pro hac Bradley D. Honnold (
27	27 GOZA & HONNOL		
28	28	100 2	
	11		

Case 4:22-md-03047-YGR Document 792 Filed 04/25/24 Page 3 of 3 Tel: (913) 451-3433 Email: kgoza@gohonlaw.com Email: bhonnold@gohonlaw.com Attorneys for Plaintiff DeKalb County School District